

Industrial Laminates Norplex, Inc.
Postville, Iowa 52162
IAD073489288

#	Date of Violation	Citation	Violating Act	Proof	Documentation	Facility Response
1	5/14/2012	40 CFR 279.22(c)(1)	Failure to label a used oil storage tank as "used oil".	During the inspection the inspector observed in the maintenance area a small tank approximately 350 gallons was not labeled as "used oil".	CEI p. 10, attachment 8, photograph 15.	Received facility response on 5/25/12. Facility sent copy of picture verifying tank was labeled with the words, "used oil".
2	5/14/2012	40 CFR 273.13(d)(1)	Failure to close containers of universal waste lamps	During the inspection the inspector observed containers of 4 foot and 8 foot lamps has flaps on two containers that were only tucked closed.	CEI p. 12, attachment 8, photographs 18 and 25.	Received facility response on 5/25/12. Corrective action date was 5/15/12. Facility sent picture to verify lamp containers would be taped shut instead of flap being folded.
3	5/14/2012	40 CFR 262.34(a)(1)(i)	Failure to conduct weekly inspection of CSAs.	During the review of inspection logs by the inspector it was observed the inspection logs had three gaps of more than one week: 8/10/11, and 9/7/11 9/16/11, 9/27/11 12/2/11, and 12/13/11.	CEI p. 14, attachment 16.	Facility responded previously 2-3 persons were authorized to do weekly container inspections. Since the inspection at the



						facility the one person is assigned to perform these duties. Also a formal policy has been prepared that outlines how duties will be delegated for backups if necessary.
4	5/14/2012	40 CFR 262.34(a)(4)	Failure to conduct annual training of hazardous waste personnel.	During the inspection the inspector reviewed the last 3 years of documentation confirming that annual hazardous waste training had been completed. No training records were available for the period between 2009 and 2012. According to Mr. Johnson and Mr. Delaney, no training was provided for this period.	CEI p. 15,	The facility stated that no hazardous waste training was done, due to oversight by the staff. The primary person responsible for these duties was promoted. The responsibility to coordinate the training had shifted to Tim Delaney and Deanna Giancaspro, who share primary responsibility.

						The facility now has three staffers that will back-up each other so that this issue will not occur again.
5	5/14/2012	40 CFR 279.24(a)(3)	Failure to transport the used oil filters to a used oil collection center that is registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil.	Following the inspection the inspector attempted to determine if Clayton County Recycling was recognized as a used oil collection center. Based on the information of the RCRA information system and the IDNR Financial and Business Assistance listing. The inspector concluded the facility failed to transport the used oil filters to a registered, licensed, permitted or recognized manager of used oil.		Receive facility response on 6/18/12. The facility stated in its response that they contacted Clayton county recycling and confirmed that they are not authorized to handle used oil. The facility will now still hot drain the filters as before, but will now be using Safety-Kleen to manage shipment and disposal of the used oil filters. Safety-Kleen currently handles our used oil.